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November 6, 2019

By ECF

The Honorable Tonianne J. Bongiovanni, U.S.M.J.
United States District Court, District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 6E
Trenton, New Jersey 08608

**Re: *Kaplan v. Saint Peter's Healthcare System*
Civil Action No. 13-2941 (MAS)(TJB) – Status Update**

Dear Judge Bongiovanni:

I write jointly on behalf of all counsel pursuant to Your Honor's Order that we provide a status report today on where we stand with the continuing discovery. Plaintiff propounded 23 requests for the production of documents and 25 requests for admission, and defendants are currently working on providing responses, which are due Monday, November 25, 2019. In addition, the parties are discussing ESI search terms and custodians, and will be in a position to determine whether they will need the Court's assistance regarding that issue within the next 2 weeks or so.

We appreciate the Court's continuing interest in this matter and willingness to assist in resolving any issues that may occur.

Respectfully yours,

/s/ Jeffrey J. Greenbaum

JEFFREY J. GREENBAUM

cc: Scott M. Lempert, Esq.
All Counsel (*by ECF*)